1	FILED ENTERED RECEIVED	Magistrate Judge Mary Alice Theiler	
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3	OCT 05 2018		
4	AT SEATTLE CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON BY		
5	DEPUTY		
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7	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON		
8	AT SEATTLE		
9			
10	UNITED STATES OF AMERICA,	NO. CR18-217 RSM	
11	 Plaintiff	MOMION FOR REMENTANT	
12		MOTION FOR DETENTION	
13	v.		
14	BRADLEY WOOLARD,		
15	Defendant.		
16			
17	The United States moves for pretrial detention of the Defendant, pursuant to 18		
18	U.S.C. 3142(e) and (f)		
19	1. Eligibility of Case. This case is elig	gible for a detention order because this	
20	case involves (check all that apply):		
21	☐ Crime of violence (18 Ú.S.C. 3156).		
22	☐ Crime of terrorism (18 U.S.C. 2332)	b (g)(5)(B)) with a maximum sentence	
23	of ten years or more.		
24		life imprisonment or death	
25	Crime with a maximum sentence of life imprisonment or death.		
26	☐ ☐ Drug offense with a maximum sente	ence of ten years or more.	
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1	· U	Felony offense and defendant has two prior convictions in the four	
2	categories ab	ove, or two State convictions that would otherwise fall within these four	
3	categories if federal jurisdiction had existed.		
4		Felony offense involving a minor victim other than a crime of violence.	
5		Felony offense, other than a crime of violence, involving possession or use	
6	of a firearm, destructive device (as those terms are defined in 18 U.S.C. 921), or any		
7	other dangerous weapon.		
8		Felony offense other than a crime of violence that involves a failure to	
10	register as a Sex Offender (18 U.S.C. 2250)		
11	\boxtimes	Serious risk the defendant will flee.	
12		Serious risk of obstruction of justice, including intimidation of a	
13			
14	2.	Reason for Detention. The Court should detain defendant because there	
15	are no conditions of release which will reasonably assure (check one or both):		
16	\boxtimes	Defendant's appearance as required.	
17		Safety of any other person and the community.	
18	3.	Rebuttable Presumption. The United States will invoke the rebuttable	
19	presumption against defendant under 3142(e). The presumption applies because:		
20		Probable cause to believe defendant committed offense within five years of	
21	release following conviction for a qualifying offense committed while on pretrial release.		
22		Probable cause to believe defendant committed drug offense with a	
23	maximum sentence of ten years or more.		
24		Probable cause to believe defendant committed a violation of one of the	
25	following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or kidnap), 2332b (act		
2627	of terrorism), 2332b(g)(5)(B) (crime of terrorism).		
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1	☐ Probable cause to believe defendant committed an offense involving a		
2	victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1), 2245, 2251,		
3	2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421,		
4	2422, 2423 or 2425.		
5	4. Time for Detention Hearing. The United States requests the Court		
6	conduct the detention hearing:		
7	☐ At the initial appearance		
8	☐ After a continuance of 3 days		
9			
10	DATED this 5th day of October, 2018.		
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12	Respectfully submitted,		
13	ANNETTE L. HAYES		
14	United States Attorney		
15	12 man Allman Son		
16	S. KAITE VAUGHAN		
17	Assistant United States Attorney		
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